



MEMO ENDORSED

MURIEL GOODE-TRUFANT
Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

July 9, 2025

Marina Moraru
Special Assistant Corporation Counsel
Office: 212) 356-2456

VIA ECF

Hon. Richard M. Berman
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

Re: *L.B. v. N.Y.C. Public Schools*, 25-2963 (RMB)(SLC)

Dear Judge Berman:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on administrative hearings under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 90-day stay of this action until October 9, 2025. Plaintiff consents to this request, and has agreed to provide the needed billing records (and a privilege log, if redacted for privilege) by July 11, 2025. On May 6, 2025, the Court granted Defendant's first request for an extension. (ECF 10). (Defendant's deadline to respond to the Complaint is currently August 14, 2025). We note that, while this is an IDEA fees-only case and liability is not at issue, without the relevant billing, Defendant cannot begin its internal settlement review process, which includes review of the underlying administrative record together with the relevant billing records, and thereafter present a reasonable early offer of settlement. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice or conferences. The parties are hopeful this matter will be resolved as well.

I also respectfully propose that, if a stay is granted, the parties be required to submit a joint status letter regarding settlement negotiations on or before October 9, 2025.

Thank you for considering these requests.

Respectfully submitted,
/s/ Marina Moraru

cc: Irina Roller (via ECF)

Application granted.
SO ORDERED: Date: 7/10/2025
<i>Richard M. Berman</i> Richard M. Berman, U.S.D.J.